## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FIJI FUNDING LLC,

Plaintiff,

v.

PENIEL ENVIRONMENTAL SOLUTIONS LLC and EARL ROBERT COOK,

Defendants.

No. 22-cv-5687-KMK

## STIPULATION AND PROPOSED CONSENT ORDER

Plaintiff FIJI FUNDING LLC and Defendants PENIEL ENVIRONMENTAL SOLUTIONS LLC and EARL ROBERT COOK, by and through their respective undersigned counsel, hereby stipulate and agree as follows:

- 1. Defendants' August 7, 2022 request for a pre-motion conference (ECF #6) is now moot and withdrawn without prejudice; and
- 2. Defendants shall answer the Complaint within thirty (30) days of the date of this Stipulation.

Gabriel Mendelberg, Esq.

Attorney for Plaintiff Mendelberg, P.C.

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Date: August 25, 2022

Jonathan R. Miller, Esq. Attorney for Defendants

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Date: August 25, 2022

## SO ORDERED:

Date: August , 2022

Hon. Kenneth M. Karas, U.S.D.J.